



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza, 37th Floor
New York, New York 10278

January 15, 2025

BY ECF

The Honorable John P. Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Wellington Eustate Espinal, et al.*, 23 Cr. 577 (JPC)

Dear Judge Cronan:

The Government respectfully requests that the time between today and April 14, 2025, the date of the next status conference in *United States v. Lopez Reyes, et al.*, 23 Cr. 501 (JPC)—a related matter in which the defendants have been charged¹—be excluded pursuant to the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Government submits that the ends of justice served by granting the proposed exclusion outweigh the best interests of the public and the defendants in a speedy trial, as the proposed exclusion will allow the defendants to review discovery, consider any pretrial motions, and negotiate a possible pretrial resolution of this case. The defendants consent to this request.

Time is excluded between January 15, 2025 and April 14, 2025 for Defendants Wellington Eustate Espinal and Heriberto Eustate Espinal under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A). The Court finds that the ends of justice served by granting this exclusion outweigh the best interests of the public and these defendants in a speedy trial, as the exclusion will allow these defendants to review discovery, consider any pretrial motions, and negotiate a possible pretrial resolution of this case. The Clerk of Court is respectfully directed to close Docket Number 76.

SO ORDERED.

Date: January 16, 2025
New York, New York

JOHN P. CRONAN
United States District Judge

Respectfully submitted,

EDWARD Y. KIM
Acting United States Attorney

By:

Maggie Lynaugh
Adam Sowlati
Chelsea Scism
Katherine Cheng
Assistant United States Attorneys
Southern District of New York
(212) 637-2448/2438/2105/2492

cc: Defense Counsel (by ECF)

¹ In light of the charges brought in *Lopez Reyes*, the Court adjourned all deadline in this matter *sin die*. (Dkt. 65).